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May 13, 2025

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: United States v. \$3,435,676.57, et al.
24 Civ. 9189 (RA)

Dear Judge Abrams:

Attorneys for Claimant Pavel Ezubov respectfully submits this letter to inform of a recent change to the scheduling of the Government's Opposition to Claimants' Motion to Dismiss ("Opposition"). (*See* ECF Nos. 17–18, 19, 21).

On February 24, 2025, Claimants filed a motion to dismiss seeking to dismiss the Verified Complaint for Forfeiture. (ECF No. 13). On March 18, 2025, pursuant to Rule G(6) of the Supplemental Rules for Admiralty or Maritime Claims and Asset Forfeiture Actions, the Government served both Claimants with Special Interrogatories (the "Interrogatories"). Under Rule G(6)(b), Claimants' responses to the Interrogatories were due within 21 days of service, which would have been April 8, 2025; however, the Government consented to extend Claimants' time to answer the Interrogatories from April 8, 2025 until April 22, 2025. The Court memorialized that deadline and also set a deadline for the Government's Opposition for May 13, 2025.

On April 22, the parties informed the Court of regulatory actions in the United Kingdom that prohibit Mr. Ezubov, Sparticle's sole director, from acting on Sparticle's behalf, leaving Sparticle unable to complete and submit its responses to the Interrogatories the Government served on it, pending Mr. Ezubov's efforts to obtain relief from this prohibition. The parties therefore agreed to extend Sparticle's time to respond to the Government's Interrogatories from April 22, 2025 to May 13, 2025. (ECF No. 19). The Court memorialized this deadline, as well as a new deadline for the Government's Opposition for June 3, 2025. (ECF No. 21).

Mr. Ezubov has submitted an application for a license that would permit him to act on behalf of Sparticle, and he has been informed by the UK regulatory agency that it "aims" to "engage with the substance of the completed application within 4 weeks," but also that a decision

is not guaranteed within that time period. In light of this status, the Government has consented to a further extension under which Sparticle's response to the Interrogatories will be due in four weeks, on June 10, 2025. Further, given the additional extension the Government has granted for the submission of Sparticle's Interrogatory responses, the current deadline for the Government's Opposition (as to both Mr. Ezubov and Sparticle) is now July 1, 2025 (i.e., 21 days after both Claimants will have responded to their respective Interrogatories, *see* Fed. R. Civ. P. Supp. R. G(6)(c)).

The parties will communicate further about additional extensions to the extent they should be necessary due to delays in resolving the UK regulatory issue. The parties thank the Court for its attention to this matter.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Patrick F. Linehan', with a stylized, cursive script.

Patrick F. Linehan